

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ABDULRAHMAN ALHARBI,)	
)	
)	
Plaintiff,)	
)	
— v. —)	CIVIL ACTION NO.
)	1:14-cv-11550-PBS
GLENN BECK; THE BLAZE, INC.;)	
MERCURY RADIO ARTS, INC.; AND)	
PREMIERE RADIO NETWORKS, INC.,)	
)	
Defendants.)	
)	

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c), Defendants Glenn Beck, TheBlaze Inc. (erroneously sued herein as “The Blaze, Inc.”), Mercury Radio Arts, Inc., and Premiere Networks, Inc. f/k/a Premiere Radio Networks, Inc. (together, “Defendants”) and Plaintiff Abdulrahman Alharbi (“Plaintiff”) (Plaintiff and Defendants together, the “Parties”) jointly request entry of the Stipulated Protective Order attached hereto as **Exhibit A** which will govern the exchange of confidential information between the Parties (and, in certain circumstances, non-parties). The Parties have negotiated and agreed upon the terms of the attached Stipulated Protective Order.

In support of their joint request, the Parties state as follows:

1. Information and documents subject to disclosure in this action may constitute confidential, proprietary, personal, or private information, and the disclosure of such information should not take place in the absence of a protective order. The Stipulated Protective Order will therefore facilitate the exchange of information between the Parties (and, in certain circumstances, non-parties) during discovery.

2. The Parties have agreed to the terms of the Stipulated Protective Order.
3. The Parties jointly request the entry of the Stipulated Protective Order.

WHEREFORE, the Parties respectfully request that the Court enter the Stipulated Protective Order attached hereto as Exhibit A.

Respectfully submitted,

Counsel for Plaintiff,

Counsel for Defendants,

/s/ Peter J. Haley

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Dated: September 8, 2015

LOCAL RULE 7.1(A)(2) CERTIFICATION

The Parties are filing this Motion jointly.

/s/ Zachary C. Kleinsasser

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants identified on the Notice of Electronic Filing on September 8, 2015.

/s/ Zachary C. Kleinsasser